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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

	X	07 Civ. 2916 (CLB)
ARAZ ALALI,	:	
Plaintiff,	:	
-against-	:	
ALBERTO DeBARA, individually, KYLE WILSON, individually, EDWARD AUSTIN, individually, GEORGE MARSHALL, individually, HUMBERTO MORRELL, individually, MATTHEW BRADY, individually, ANTHONY MUPRHY, individually, ROBERT GAZZOLA, individually, PATRICK J. CARROLL, individually, and the CITY OF NEW ROCHELLE, New York,	:	REPLY DECLARATION OF LALIT K. LOOMBA, ESQ.
Defendants.	:	

X

LALIT K. LOOMBA, an attorney admitted to practice law before the Courts of the State of New York and the United States District Court for the Southern District of New York, hereby declares under penalty of perjury, pursuant to 28 U.S.C. §1746, as follows:

1. I am an associate with the firm of Wilson, Elser, Moskowitz, Edelman & Dicker LLP. I submit this reply declaration in further support of the motion by defendants Alberto DeBara, Kyle Wilson, Edward Austin, George Marshall, Humberto Morrell, Matthew Brady, Anthony Murphy, Robert Gazzola, Patrick J. Carroll (the "Individual Defendants") and the City of New Rochelle (the "City") (collectively, the "Defendants"), for summary judgment.

2. Section 2.47 of the New Rochelle Police Department Rules and Regulations is referenced in a memorandum purportedly written by plaintiff Araz Alali, a copy of which is annexed as Exhibit 5 to the Declaration of Drita Nicaj submitted in opposition to Defendants' motion for summary judgment.

3. Annexed hereto is the affidavit of Lt. Gary Robinson, sworn to September 11, 2008, attached to which is a full and complete copy of Section 2.47 of the Rules and Regulations of the New Rochelle Police Department.

4. Separately annexed hereto is Defendants' Response to Plaintiff's Counter-Statement of Material Facts.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 16th day of September, 2008.



Lalit K. Loomba